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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

John J. Smith, III

Carol M. Smith : CASE NO. 4:21-bk-12762-pmm

Debtors : CHAPTER 13

:

Scott F. Waterman, Trustee

Movant

:

John J. Smith, III Carol M. Smith Respondents

ANSWER TO MOTION TO DISMISS CASE

NOW COME John J. Smith, III and Carol M. Smith ("Debtors"), by and through their counsel, John M. Hyams, and files her Answer to the Motion to Dismiss Case of Scott F. Waterman, Standing Chapter 13 Trustee as follows:

- 1. Debtors have admittedly fallen behind on their Chapter 13 Plan payments due to unforeseen circumstances.
- 2. On January 26, 2022, Debtors made a payment through electronic means to cure the arrearages.

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Wherefore Debtors John J. Smith, III and Carol M. Smith respectfully request that this Honorable Court enter an Order denying Movant's Motion to Dismiss Case.

Respectfully submitted,

LAW OFFICES OF JOHN M. HYAMS

Dated: January 26, 2022 By: /s/ John M. Hyams

John M. Hyams 2023 N 2nd Street Harrisburg, PA 17102 Attorney for Debtors